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Attorney for Petitioner
NAVNEET GHOTRA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NAVNEET GHOTRA,)	CASE NO: C07-4428 MMC
)	
Petitioner,)	
)	
v.)	PETITIONER'S UNOPPOSED MOTION
)	TO EXTEND TIME BY ONE BUSINESS
)	DAY TO FILE REPLY TO OPPOSITION
MICHAEL CHERTOFF, Secretary,)	TO PETITION; PROPOSED ORDER
Department of Homeland)	
Security, NANCY ALCANTAR, Field)	[Alien Registration No.: A77 381 997]
Office Director, Immigration)	
and Customs Enforcement, and)	
ALBERTO GONZALES, Attorney)	Hearing Date: October 12, 2007
General of the United States,)	Time: 9:00 a.m.
)	
Respondent.)	
)	
	/	

Pursuant to Local Rules 6-1 and 6-3, Navneet Ghotra, petitioner herein, hereby respectfully moves the Judge of the United States District Court, Northern District of California, for an order extending the time to reply to Respondent's Opposition to Petition for Writ of Habeas Corpus from the current due date of September 28, 2007 to the next business day, October 1, 2007.

1 Counsel for respondents herein, Edward Olsen, Assistant
2 United States Attorney, United States Attorney Office, does not
3 oppose this motion.

4 The reason for this motion is that counsel for petitioner
5 has been in protracted contested habeas corpus proceedings in
6 Garcia Garnica v. Chertoff, et. al., United States District
7 Court, Northern District of California, Case No. C07-4953 SBA
8 and Garcia Garnica v. Chertoff, et. al., United States Court of
9 Appeals for the Ninth Circuit, Case No. 07-16737, for the past
10 four days and has been unable to complete the reply due to the
11 unanticipated conflict.

12 Based on the foregoing, it is respectfully requested that
13 the motion be granted.

14 Dated: September 28, 2007

/s/

JAMES TODD BENNETT
Attorney for Petitioner
Navneet Ghotra

17
18 **DECLARATION OF COUNSEL**

19 I, James Todd Bennett, hereby declare that:

20 1. I am an attorney at law, duly licensed to practice law
21 by the California State Bar.

22 2. I am counsel of record for petitioner herein.

23 3. The reply to the Respondent's Opposition to Petition
24 for Writ of Habeas Corpus is currently due by September 28, 2007
25 by the court's order pursuant to stipulation by the parties.

PROPOSED ORDER

Upon a showing of good cause:

The time for petitioner to reply to the Respondent's
Opposition to Petition for Writ of Habeas Corpus is extended to
October 1, 2007.

DATED: October 1, 2007



MAXINE M. CHESNEY
United States District Judge